

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JERIME MILLS

Plaintiff,

v.

**RELADYNE WEST, LLC AND
RELADYNE, LLC**

Defendants.

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C.A. NO. 4:20-cv-03758

**ROBERT KENNETH (KENT) WELLINGTON, II'S
MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF THIS COURT:

I, Robert Kenneth (Kent) Wellington, II, file this motion for admission pro hac vice to appear before the Court on behalf of Reladyne West, LLC and Reladyne, LLC pursuant to Rule 19 of the Rules Governing Admission to the Bar of Texas.

1. I am associated with Joseph A. Garnett (Texas State Bar No. 07680600) of Sheehy, Ware & Pappas, P.C., 909 Fannin Street, Suite 2500, Houston, Texas 77010, (telephone): 713-951-1000, (facsimile) 713-951-1199, (email): jgarnett@sheehyware.com.

2. I am an active member in good standing with the State Bar of Ohio and am admitted to practice in the State of Ohio.

3. I have not been the subject of disciplinary action in the last five years by the bar or courts of any jurisdiction where I have been licensed.

4. I have not been denied admission to any state or federal court during the last five years. I am familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing the conduct of members of the State

Bar of Texas. I will at all times abide by and comply with these rules as long as this case is pending, and I have not withdrawn as counsel from the proceeding.

5. Pursuant to the Texas Rules Governing Admission to the Bar of Texas, Rule 19(a), I have filed an application for admission *Pro Hac Vice* with the Texas Board of Law Examiners and paid the \$250 filing fee. The Texas Board of Legal Examiner's letter acknowledging the application is attached to this motion as Exhibit "A" and incorporated by reference.

6. My office address, telephone number, fax number and email address are included in my signature below.

7. This motion is accompanied by the affidavit of resident practicing Texas attorney, Joseph A. Garnett, who verifies my reputation as a practicing attorney and recommends that I be granted permission to participate in the particular proceeding before this court. Mr. Garnett's affidavit is attached as Exhibit B.

For these reasons, I ask this Court to grant my motion pro hac vice and allow me to appear before this Court until the conclusion of this case.

Respectfully submitted,

GRAYDON

By: 
Robert Kenneth (Kent) Wellington, II
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Cincinnati, Ohio 45202
Telephone: (513) 629-2799
Mobile: (513) 484-2812
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Email: kwellington@graydon.law

**Attorneys for Defendant
Reladyne West, LLC and
Reladyne, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on December 23rd, 2020 a copy of this pleading was electronically filed with the Clerk of Court and a true and correct copy of the foregoing was served on all counsel of record as follows:

Joseph K. Plumber
Law Office of Joseph K. Plumber
1200 Rothwell Street
Houston, Texas 77002
(713) 384-5507 office
(866) 252-3048 facsimile


Robert Kenneth (Kent) Wellington, II

4061093

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Affidavit of Robert Kenneth (Kent) Wellington, II

STATE OF OHIO

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COUNTY OF HAMILTON

BEFORE ME, the undersigned authority, on this day personally appeared, Robert Kenneth (Kent) Wellington, II, who, being by me here and now duly sworn upon oath says:

"My name is Robert Kenneth (Kent) Wellington, II. I am over the age of eighteen (18) years, am of sound mind, and am fully competent to testify in all matters stated herein. I have read the Motion for Admission Pro Hac Vice and every statement contained within said motion is within my personal knowledge and are true and correct."



Robert Kenneth (Kent) Wellington, II

Sworn to and Subscribed before me on this the 23rd day of December 2020.


NOTARY PUBLIC, STATE OF OHIO



NATHAN SWEHLA
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration
Date. Section 147.03 O.R.C.


PRINTED NAME

My Commission Expires on: _____